

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. 18502, 18825

**URGENT MOTION FOR ENTRY OF ORDER
GRANTING ACCESS TO GOVERNOR PIERLUISI TO HEARING
ON CONFIRMATION OF TITLE III JOINT PLAN OF ADJUSTMENT OF THE
COMMONWEALTH OF PUERTO RICO, ET AL.**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) and Governor Pedro R. Pierluisi Urrutia (the “Governor” and together with AAFAF, the “Executive Branch Movants”) through the undersigned counsel, hereby submit this *Urgent Motion for Entry of Order Granting Access to Governor Pierluisi to Hearing on Confirmation of Title III Joint Plan*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Building Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS). (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

Of Adjustment of The Commonwealth Of Puerto Rico, Et Al. (the “Urgent Motion”), stating and praying as follows:

BACKGROUND

1. On October 14, 2021, the Court entered an order [ECF No. 18502] *Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* (the “Order”) for confirmation of the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al* (the “Plan”), beginning on November 8, 2021 (the “Confirmation Hearing”).

2. In compliance with the Order’s instructions for registration to participate at the Hearing, on October 27, 2021, AAFAF filed its *Informative Motion Regarding Attendance At (I) Hearing on Confirmation of Seventh Amended Title III Joint Plan of Adjustment Of The Commonwealth of Puerto Rico, Et Al. And (II) Pretrial Conference in November 2021* (the “Attendance Motion”) [ECF No. 18825].

3. Through the Attendance Motion, AAFAF informed that it would be seeking, among other things, to be heard in connection with the Plan, as amended yesterday [ECF No. 19053].

4. In light of the historic and momentous nature of this proceeding regarding the Plan, the office of the Governor requests one additional videoconferencing technology line so that the Governor (or a member of his senior staff) can observe and listen to the proceedings of the Confirmation Hearing, including, but not limited to the opening and closing arguments in connection therewith, and the voices of citizens the Court has permitted to be heard at the confirmation hearing.

5. Thus, the Executive Branch Movants hereby respectfully (i) request that the Court enter an order, substantially similar in form and substance to that attached herein as **Exhibit A** (the “Proposed Order”), granting this Urgent Motion, and (ii) inform their willingness to, if the Court grants the same, provide an email address to promesaregistration@prd.uscourts.gov for an individual to be granted access to the Confirmation Hearing.

WHEREFORE, the Executive Branch Movants request the Court enter the Proposed Order and grant such other relief as is just and proper.

Dated: November 4, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Peter Friedman

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Exhibit A
Proposed Order